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ABSTRACT

Purposes of 1202 Commissions and projected new roles with respect to continuing education are discussed. Both the House and Senate versions of the legislation reauthorizing the Higher Education Act of 1965 delete any reference to 1202 Commissions and substitute for it a state agreement provision. What in effect the new legislation does is to carry forward the 1202 functions, to reinforce further the recognition of the federal interest in comprehensive statewide planning, but to leave the matter of structure and means of accomplishing educational objectives to states, their legislatively authorized higher education boards or agencies, and to institutions. One of the changes related to the 1202 Commissions or the 1202 functions of state higher education agencies is an increase in the scope of statewide planning. A second change is the number of states in which responsibility for administration of Title I has been assigned to the principal state agency responsible for coordination or governance of higher education in spite of the fact that the federal legislation does not mandate such consolidation. A third change indicating a concern for continuing, adult education and lifelong learning has been frequent funding for studies of and planning in this area. The new Title I and policy issues on the state level related to continuing education and social policy are considered. (SW)

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INCREASED ADMINISTRATIVE AUTHORITY OF 1202 COMMISSIONS

AND THEIR PROJECTED NEW ROLES WITH CONTINUING EDUCATION

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INCREASED ADMINISTRATIVE AUTHORITY OF 1202 COMMISSIONS
AND THEIR PROJECTED NEW ROLES WITH CONTINUING EDUCATION

I need to begin by suggesting that the title assigned to me for this session is somewhat misleading. If my remarks were to be confined strictly to a discussion of increased administrative authority of 1202 Commissions and their projected new roles with continuing education it would either be an historical disquisition or a very short report. As I presume you are well aware, both the House and Senate versions of the legislation reauthorizing the Higher Education Act of 1965 delete any reference to 1202 Commissions and substitute for it a state agreement provision.

According to the House version of the state agreement provisions, the state is to designate the state agency "responsible under state law for comprehensive planning or financing for postsecondary education" (Section 1203 [a][1]). In addition, the state is to indicate any other agencies responsible for other statewide postsecondary activities such as Title I and their relation to the designated agency in the planning process. The Senate version similarly calls for agreement with the state entity responsible for comprehensive planning and policy formulation for postsecondary education which is authorized to act on behalf of the state by state law and to make legal agreements between the state and the federal government (Section 1203 [b][4] and [e]). The House version in particular prohibits the Secretary from prescribing any "specific state organizational structure for achieving participation in the planning, or administration of programs, or for statewide planning, coordination, governing, regulating, or administering of postsecondary education agencies, institutions, or

programs in the state" (Section 1203[.][A]). The same intent is present in the Senate bill.

It thus seems clear that unless something untoward happens in full committee or on the Senate floor 1202 Commissions as 1202 Commissions will disappear and the states will have considerably more leeway or freedom than under present law to recognize or develop structures appropriate to the traditions, conditions and expectations of the states in relation to postsecondary education including adult and continuing education. This does not mean that states may not designate postsecondary education planning, coordinating, or governing agencies which also serve as 1202 Commissions under the present law as the designated agencies responsible for comprehensive statewide planning under the new state agreement provisions. In all likelihood this is what will happen in many, perhaps most, states. Nor does it necessarily mean that current structures for administration of Title I including delegation to advisory boards, agencies, or even institutions will necessarily change so long as comprehensive statewide planning for adult and continuing education is integrated with or clearly related to comprehensive statewide planning for postsecondary education as a whole. These agencies may indeed remain the same or be modified but the federal government or the Secretary cannot under the proposed new law dictate what the structure will be. It is true that the content and direction of the almost identical new versions of Title I in House and Senate are different from the old Title I but this is another matter and one we will return to shortly.

What is important at this point is (1) that 1202 Commissions as 1202 Commissions will disappear but (2) that statewide postsecondary or higher

education boards or agencies whether primarily planning agencies, coordinating agencies, or statewide governing agencies which also served as 1202 Commissions will not disappear and these are most likely to be designated statewide comprehensive planning agencies under the new legislation. On the surface this might seem like a quibble over terminology and since a rose is a rose regardless of what it is called the title of this discussion should remain the same. I would like to suggest, however, that this is far from the case.

The new state agreement provisions if contained in the final act involves a major shift in federally legislated federal/state relations in postsecondary education--a shift decidedly to the advantage of states and institutions. It means that unlike the legislative history of the last 25 years the federal government will no longer mandate specific state or institutional structures to administer every new or revised categorical program enacted. Nor will it use such newly mandated agencies to dispense funds, or to prepare segmental state plans with extended boiler plate and little or no relation to each other. It is a first major step in the direction of formulating federal legislation in terms of objectives and populations to be served leaving to states and institutions the utilization or development of appropriate structures and administrative arrangements for achieving the objectives and serving the populations. It reduces the likelihood of federally induced fragmentation of programs and activities on state and institutional levels.

In addition it does something else that is directly relevant to the subject at hand, i.e. adult, continuing education and lifelong learning, and to the title of this report. It means that the crucial question and

issue is not 1202 Commissions and their administrative roles, old or new, in continuing education but rather the roles and responsibilities of statewide postsecondary or higher education boards or agencies and of the states as reflected through them in the arena of adult, continuing education and lifelong learning. And I would submit that such boards and agencies have and would have had crucial roles and responsibilities in relation to continuing education whether or not there had ever been any 1202 legislation or commissions. Further, if the state agreement legislation should not pass, or Title I should not pass, or, more likely neither should be funded, the issue of the relation of statewide planning, coordinating and governing agencies to continuing education will remain a crucial one in most states.

This is not to say that the older Title XII legislation was a mistake or that the 1202 Commissions have not on the whole been successful in (1) expanding the scope of planning in a number of states from emphasis on public institutions alone to include independent institutions, proprietary institutions and vocational-technical institutions and programs, (2) involving a wider range of institutions, agencies and individuals in the planning process, (3) relating formerly segmented and categorical programs and planning activities to each other and overall institutional and state concerns, and (4) carrying out types of studies crucial to state, institutional, federal and student concerns that might otherwise not have been done or have had a low priority in limited funding situations. The higher education amendments of 1972 changed both state and national focus from traditional higher education and in many cases public higher education alone to postsecondary education. It also for the first time recognized that it is in the federal interest as well as the interest of the states

that comprehensive statewide planning should be encouraged, if for no other reason, because isolated federal programs not related in some way to state and institutional plans and objectives are likely to be less than fully effective in achieving their objectives. This is particularly the case given the fact that by far the largest source of institutional funding or support for higher education comes from the states. Even though consolidation of programs was not mandated, the 1202 Commissions in many cases have managed to bring federal and state programs into some productive relation to each other, to reduce barriers to communication and to cooperative planning. From this perspective they have served an important interim function. The new legislation would not have been possible without the precedent of the 1202 Commissions. What in effect the new legislation does is to carry forward the 1202 functions, to reinforce further the recognition of the federal interest in comprehensive statewide planning, but to leave the matter of structure and means of accomplishing educational objectives to states, their legislatively authorized higher education boards or agencies, and to institutions, where it should be.

Part of the reason the 1202 Commissions have been as effective as they have is the fact that in the majority of states the agency designated as the 1202 Commission was and is the postsecondary or higher education agency already established in the state by legislation or constitution with responsibility for statewide planning. What the 1202 legislation did in some instances was to broaden the agency's scope. Fortunately, in implementing the 1202 legislation the Office of Education did not press literal interpretation of the representative aspects of the legislation but left it to the states to determine the way in which the representative requirements were met.

By 1972 all but three states (Delaware, Vermont and Nebraska) had already developed legislatively or constitutionally authorized state boards or agencies responsible generally for planning, program review and budget review. Admittedly these agencies did and do vary tremendously from state to state. At that time, that is 1972, 19 were consolidated governing boards, 11 for all public institutions and 8 for senior institutions only; 28 were coordinating boards. Among the coordinating board states the powers and responsibilities of these boards range from states like Oklahoma where the Board of Regents submits a consolidated budget, receives legislative appropriations for allocation to the institutions, approves programs, and is responsible for statewide planning, to a state like New Hampshire, where the agency has no statutory role in budget review or program approval and is advisory only. In all states with boards, however, the board had and has some responsibility for statewide planning.

After activation of the 1202 Commission legislation in 1974, 30 states designated their existing state higher education agencies as 1202 Commissions, either as constituted (19) or as augmented with additional representation for the purpose (11). Six states that initially set up separate commissions either changed them to the existing commissions or established the new commissions legislatively as coordinating agencies (for reasons that did not relate directly to the 1202 legislation). Two of the original four states that did not establish or designate commissions subsequently designated their state higher education agencies. Thus today in 38 states it is the state postsecondary or higher education agency or a modification of it that is also the 1202 Commission. In ten states new or separate commissions were established and continue. Of these ten states six are states with governing boards for senior institutions only, three are

states with no other statewide coordinating or governing board, and one is a state with a separate coordinating agency where the state advisory council on vocational education has been named the 1202 Commission. Two states have never designated or established commissions (North Carolina and Wisconsin).

Since 1972 there are a number of changes that can be related to the 1202 Commissions or to the 1202 functions of state higher education agencies or boards. One of these changes is increase in the scope of statewide planning either by constitution or statute, or by agency policy, or by executive order. In 1972, 47 state postsecondary education boards or agencies were responsible for planning for senior public institutions, 45 for public two-year institutions, 36 for public postsecondary vocational education, 15 for independent institutions, and 9 for proprietary institutions. Today agencies in all 50 states are responsible for planning for senior public institutions, 47 for two-year institutions, 48 for public postsecondary vocational education, 46 for independent institutions, and 41 for proprietary institutions.[1]

A second change is the number of states in which responsibility for administration of Title I has been assigned to the principle state agency responsible for coordination or governance of higher education in spite of the fact that the federal legislation does not mandate such consolidation. In 1972 responsibility for Title I was placed with 14 governing boards, 16 coordinating boards, 12 institutions, and 8 other state commissions including 3 facilities commissions. Today it rests with 15 governing boards, 25 coordinating boards, 5 institutions, 2 other state agencies and 3 separate

[1] McGuinness, Aims C., Intergovernmental Relations of Postsecondary Education: The Case of the 1202 Commissions. Syracuse, New York: Syracuse University. Unpublished doctoral dissertation. p. 382.

1202 Commissions.[2] However, that this move towards consolidation was a felt state need and not solely the result of federal suggestion is indicated by the fact that in 7 states the state higher education agency to which Title I is attached is not the 1202 Commission.

A third change or result that indicates the high priority and concern in states about continuing, adult education and lifelong learning is that quite apart from Title I planning funds, in 1976-77 and 1977-78 the area in which statewide planning grants under Section 1203 were most frequently used was in studies of and planning for adult and continuing education. It should be kept in mind that states had unlimited discretion as to how these funds were to be used.

Title XII and the 1202 Commissions have made a difference, have reinforced state efforts to get their acts together, and have helped to highlight in many instances state awareness and concern with issues of adult and continuing education. Most of the state 1202 postsecondary agencies have also more recently been designated as agencies to plan for and implement education information centers under the higher education amendments of 1978. Since the education information centers legislation is designed to provide educational information and counseling for adults as well as traditional college age students state agency involvement in planning and providing for educational opportunities for adults has been further enhanced.

While the 1202 Commissions have made a difference and a contribution, if my basic thesis is correct the state and state agency concern with adult and continuing education is far more fundamental than Title I or Title XII

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[2] Ibid., p. 380.

or any form of federal involvement. It relates to the basic state responsibility for education in general and postsecondary education in particular. It is further enhanced by conditions facing the states and postsecondary education in the 1980s and beyond. It may in fact be exacerbated by the multiplicity of federal programs not just or primarily in the higher education act that bear on adult education, including adult basic education, career education, youth unemployment, vocational education, agricultural extension, and on and on. The states are faced with a series of critical policy issues on the state level related to continuing education and social policy. These include:

- The extent to which the state has a responsibility for providing continuing education to citizens of all ages.
- How to deal with the impact of shifting demographic characteristics of the population including decrease of traditional college age students and increase in older age groups with related but differing educational needs.
- Whether higher educational institutions should be encouraged to engage in unlimited competition for older students to fill the places of decreasing 18 to 24 year olds or whether this is a time not for eliminating competition but for rather careful review of delivery of services to older students in the light of their needs, institutional missions, and state educational objectives.
- What the relations are or should be among the variety of institutions and agencies serving older students including business, industry, labor, libraries, community centers, and various other organizations as well as postsecondary educational institutions in meeting the

educational needs of adults.

- Given fiscal stringency and inflation, what the resources public and private for adult, continuing education and lifelong learning actually are and how and if they can be used in complementation of each other.
- Since the majority of those involved in adult education are already the best educated, how the underserved, minorities, the poor can best be encouraged to become involved, their needs and interests identified, and appropriate services provided.
- What the cost benefits of continuing and adult education are in contrast to other social agencies and activities supported by public funds.
- How most effectively quality can be assured in adult and continuing education programs particularly in off-campus and nontraditional settings, or, more fundamentally, how older educational consumers can be protected against fraud, abuse and submarginal educational activities.
- How the activities of various state agencies involved in different aspects of adult and continuing education can be more effectively coordinated and how these in turn can be coordinated with federal initiatives.
- Whether, in what way, and by what means states should support needy older students in pursuit of additional education.
- How effective planning to meet adult needs involving not only institutions, organizations, and agencies but the wider community including business, industry, labor, etc. and older citizens

themselves can best be carried out and implemented.

These are only part of the concerns and policy issues that state postsecondary boards or agencies, institutions, and executive and legislative branches of state government will need to deal with in the decade ahead. At least the primary catalytic responsibility is likely to rest with the state boards or agencies. The answers or solutions or policies developed in cooperation with institutions, state government, and other organizations will have a profound effect not only on continuing education but on postsecondary education as a whole in the next decade.

The fact that state agencies are involved and concerned with the issues in adult and continuing education is underlined not only by the high priority in planning activities under 1203 funds noted earlier but by a number of other things. In the 1978 and 1979 annual reports of state higher education agencies published before the annual meeting of the State Higher Education Executive Officers Association in July of each year, adult, continuing education and lifelong learning have ranked among the highest categories of over a hundred issues reported as significant by the executive officers.[3] A recent poll of critical issues conducted by the state information network of the State Higher Education Executive Officers and the National Center for Higher Education Statistics listed coordination of adult and off-campus programs as a matter of high priority for 26 states and moderate priority for another ten.[4] Funding of continuing education as an issue received high priority from 15 states. In the chapter on "State Policies: Plans and Activities" in Richard Peterson and Associates' Lifelong Learning in America Susan Powell lists some 183

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[3] Education Commission of the States, 1979 Major Issues of Concern to State Higher Education Agencies. August 1979.

[4] Jane Ryland, Issues of Current Interest to the States. Boulder, Colorado: SHEEO/NCES Communications Network. Unpublished report. 1980.

documents from 37 states, all but one of them developed since 1971, related to lifelong learning.[5] The Education Commission of the States in cooperation with the State Higher Education Executive Officers has recently received a three-year grant from the W. K. Kellogg Foundation to work with six pilot states in developing and implementing more effective planning and coordination of lifelong learning activities. To participate as a pilot state requires time and fund commitments from the states involved. Fourteen states applied for pilot state status. An additional 16 states asked to be included by sending a representative to the deliberations of the technical task force associated with the project at their own expense. Lifelong learning has been identified through the priority and policy committees of the Education Commission of the States as a central issue for development of policy recommendations to the 1980 annual meeting. It would thus seem clear that quite apart from federal initiatives adult education is a major area of concern at the state level and one in which more rather than less activity is to be expected in the years ahead regardless of whether Titles I and XII of the higher education reauthorization proposals are enacted.

Returning to the federal scene and the proposed new Title I of the Higher Education Act, it should be noted again that not coincidentally the statewide planning and particularly the continuing education provisions in both House and Senate versions are almost identical. There is some difference in formulas and authorization levels but the latter, as you are well aware, have little impact on appropriations. The Senate has added three additional parts to Title I in its version somewhat but not as directly related to continuing education--a Part A providing for a

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[5] San Francisco: Jossey-Bass, Inc., 1979. pp. 257-275.

Commission on National Development in Postsecondary Education, a Part B entitled Institutional Adaptation and Innovation which deals with everything from encouraging consortia and inservice education for faculty to women's work site developmental demonstrations, and a Part C on Postsecondary Education and Youth Unemployment. But the critical part of both versions which constitutes the whole of the House version is the sections on statewide planning, information services and continuing education. Regardless of what happens to the other Senate provisions these are the sections that will be in the final act.

This new Title I is a major departure from the old Title I and does involve a much closer liaison between comprehensive statewide planning and planning agencies with institutions and agencies providing continuing education services than under the old Title I. Two of the "Findings" are perhaps key to the new act. The first finding is (6):

> Service in the realm of continuing education will be further advanced through increased emphasis on planning and coordination which more effectively utilizes existing resources of both public and private sectors;

and finding (7):

> To meet the unique problems and needs of adults who are disadvantaged in seeking access to postsecondary educational opportunities, resources must be marshalled from a wide range of institutions and groups, including community and junior colleges, community-based educational institutions, business, industry, labor, and other public and private organizations and institutions. (Section 101[6][7]).

Essentially the new Title I does a series of things:

1. It clears up the schizophrenia of the old Title I as to whether it is a continuing education or a community service act. The new Title I is primarily a continuing education act.

2. It broadens the range of providers of continuing education considered and thus of potential recipients of grants to include "institutions of higher education, public and private institutions and organizations, business, industry, and labor, or any combination thereof" (Section 104[c]). It thus recognizes that adult, continuing education and lifelong learning extends considerably beyond the activities of traditional institutions as important as these are.

3. It recognizes that effective planning for continuing education cannot be done in isolation or as an addendum to statewide planning for post-secondary education as a whole or by individual institutions without reference to the scope of other institutions and agencies in the state and brings planning for continuing education into the mainstream of statewide planning for postsecondary education as a whole.

4. It focuses the primary federal emphasis and concern in and with continuing education on the unserved, the inadequately served, the rurally isolated, minorities, the handicapped, and the economically depressed. It thus at least in part is designed to help redress the balance in continuing education which has favored the already educated persons who can afford it and who will avail themselves of it anyway.

5. It recognizes the integral connection between adequate educational and occupational information and counselling for students of all ages and real educational opportunity both in traditional and continuing education. It does so by incorporating in Title I the Educational Information Centers provisions added to Title IV in 1976 plus calling for coordination of these with information and counselling provisions in other federal and state programs.

The proposed legislation as already noted does not mandate particular structures for carrying out its intent nor does it prescribe in detail how the objectives are to be obtained. It reinforces state, institutional and community activities and underlines the particular federal concern with access and serving the underserved. It does call for close cooperation among state postsecondary or higher education planning boards and agencies and institutions, organizations, business, industry and labor. It recognizes as has not always been the case in the past that planning for adult, continuing education and lifelong learning is not just an institutional function, as important as institutional planning is, nor is it a separable statewide function but to be effective must be an integral part of, or integrally related to, statewide planning for postsecondary education as a whole. The same considerations hold in relation to developing effective information and counselling systems to serve adult learners. This does not mean that special boards or agencies or institutions may not as now have primariy responsibility for developing the continuing education components in the statewide planning process but it does mean that how these components are incorporated into the statewide planning process and are effected by it becomes an important consideration.

The proposed act does offer a new and unique opportunity through federal incentives rather than directives to develop cooperative reassessment of directions and resources in adult, continuing education and lifelong learning, to reinforce mutual institutional, organizational, state, and federal objectives in providing services to adult learners, and to provide focus without dampening or eliminating new initiatives or reasonable competition from an area which sometimes has had more of the

characteristics of a jungle. It may even help as a basis for developing more effective coordination among separate federal programs relating to continuing education and information services in terms not only of their relation to each other but also in terms of providing resources to institutions and states.

Far too frequently in the past adult and continuing education has tended to be the stepchild of higher educational institutions whose primary missions have been concerned with serving 18- to 24-year-old full-time resident students. Institutional policies and programs were primarily targeted on such students. Evening, summer, and continuing education courses were not considered quite legitimate. As dean of a college of liberal arts I can remember a protracted faculty debate by faculty members, many of whom earned extra income teaching continuing education courses, as to whether evening course credits should be accepted by the colleges for regular degrees. Current economic conditions, demographic information, and educational perspectives are changing and have changed this. Traditional college students undoubtedly will and should remain an important, even crucial, concern of colleges and universities. But I strongly suspect that in the next decades not only will concern with part-time, adult and continuing education both in and out of higher educational institutions become more central, the experiences of dealing with adults and their needs is likely to have a profound impact on how we educate traditional college-age students as well.

Most important, however, is that the real interests, needs, concerns of adult learners be adequately met including providing educational opportunity for the underserved members of our society. If this is the case,

it seems to me, the need for cooperation among institutions, social organizations, business, industry, labor, state postsecondary or higher education boards or agencies, the legislative and executive branches of state government, and the federal government all of whom are involved in the issues of adult, continuing education and lifelong learning is crucial if the needs of adult learners are to be met.

And this brings us back full circle to the central issue. In the light of state and institutional concerns with continuing education whether the federal government funds the new Titles I and XII or not, state postsecondary education boards and agencies are likely in many states in cooperation with institutions to become more involved in continuing education issues than in the past not necessarily as controllers or regulators but as facilitators, catalysts, and advocates with institutions for more adequate state policies and support. The new federal legislation, if funded, not only will provide more latitude for institutional and state activities in continuing education but will provide help in addressing some of its more acute problems.

We are facing a most interesting decade, one in which continuing education is likely to be the most rapidly and possibly the only expanding area of postsecondary education. Continuing education also is likely to be the one area in which innovation is most welcome. At the same time if it is not to become a quagmire of competitive programs, many of dubious quality, but a field of widening real opportunities for adults compatable with their needs and interests and of service to those who could benefit from it most as well as the already educated who can afford it, cooperative planning involving state agencies, institutions and other groups and

agencies concerned and involved is essential. The challenge is great, the problems are real, the opportunities are unlimited and the states in cooperation with the institutions have a vital role to play.

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appendix attached

APPENDIX

TABLE 32

STATE AGENCIES RESPONSIBLE FOR TITLE I OF THE HIGHER EDUCATION ACT (COMMUNITY SERVICE AND CONTINUING EDUCATION), 1972 and 1979

1972					1979				
GOVERNING BOARD	COORDINATING BOARD	INSTITUTION	OTHER STATE AGENCY	SEPARATE HIGHER EDUCATION FACILITIES COMMISSION	GOVERNING BOARD	COORDINATING BOARD	INSTITUTION	OTHER STATE AGENCY	SEPARATE 1202 COMMISSION
Arizona	California	Alabama	Hawaii	Kansas	Arizona	Alaska	Alabama	Missouri	Delaware
Florida	Colorado	Alaska	Louisiana	South Dakota	Florida	California	Arkansas	Washington	Georgia
Georgia	Connecticut	Arkansas	Missouri		Idaho	Colorado	Maine		Wyoming
Iowa	Illinois	Delaware	Nebraska		Iowa	Connecticut	Vermont		
Mississippi	Indiana	Kentucky	Washington		Kansas	Illinois	Wisconsin		
Montana	Massachusetts	Maine			Mississippi	Indiana			
Nevada	Minnesota	Maryland			Montana	Kentucky			
New Hampshire	New Jersey	New Mexico			New Hampshire	Louisiana			
North Carolina	New York	South Carolina			North Carolina	Maryland			
North Dakota	Ohio	Tennessee			North Dakota	Massachusetts			
Rhode Island	Oklahoma	Vermont			Rhode Island	Minnesota			
West Virginia	Oregon	Virginia			West Virginia	Nebraska			
Idaho	Pennsylvania	Wisconsin			Utah	New Jersey			
Utah	Texas				Hawaii	New Mexico			
	Wyoming				Nevada	New York			
	Michigan					Ohio			
						Oklahoma			
						Oregon			
						Pennsylvania			
						South Carolina			
						South Dakota			
						Tennessee			
						Texas			
						Virginia			
						Michigan			
14	16	13	5	2	15	25	5	2	3

TABLE 33

RELATIONSHIP BETWEEN 1202 COMMISSIONS
AND STATE AGENCY OR INSTITUTION
DESIGNATED TO ADMINISTER TITLE I
OF THE HIGHER EDUCATION ACT, 1979

Relationship		No. of States
State Agency for Title I is the Same as, or Administered by the Agency Designated as the 1202 Commission		35
Alaska	Nevada	
Arizona	New Jersey	
California	New Mexico	
Colorado	New York	
Connecticut	North Dakota (1)	
Delaware	Ohio	
Georgia (1)	Oklahoma	
Hawaii	Oregon	
Idaho	Pennsylvania	
Illinois	Rhode Island	
Indiana	South Carolina	
Louisiana	South Dakota	
Maryland	Tennessee	
Massachusetts	Texas	
Michigan	Utah	
Minnesota	Virginia	
Montana	West Virginia	
Nebraska		
State Higher Education Agency or Statewide Board for Higher Education Other than 1202 Commission		7
Florida (2)	Mississippi	
Iowa	North Carolina (3)	
Kansas	Wisconsin (3)	
Kentucky		
State Institution of Higher Education		6
Alabama	Vermont	
Arkansas	Wyoming	
Maine		
New Hampshire		

TABLE 33 - Continued

Relationship	No. of States
State Agency for Community Development (Neither 1202 Commission nor State Higher Education Agency) Missouri Washington	2

NOTES: (1) Administrative responsibility for Title I is delegated to or carried out cooperatively with state university. (2) Florida Board of Regents is within the Department of Education under jurisdiction of the State Board of Education. (3) No 1202 commission is North Carolina and Wisconsin.